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October 21, 2011

EX PARTE NOTICE

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
Establishing Just and Reasonable Rates for Local Exchange Carriers,
WC Docket No. 07-135
High-Cost Universal Service Support, WC Docket No. 05-337
Developing a Unified Intercarrier Compensation Regime,
CC Docket No. 01-92
Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Lifeline and Link-Up, WC Docket No. 03-109**

Dear Ms. Dortch:

On October 21, 2011, Jerry James, CEO, and Karen Reidy from COMPTTEL, the Honorable Chip Pickering and Susan Butler of Capitol Resources, LLC, Thomas Jones of Willkie Farr & Gallagher LLP, Christopher Murray of Earthlink, Lisa Youngers and Tiki Gaugler of XO Communications, and Bill Haas of PAETEC (by phone) met with Commissioner McDowell and Christine Kurth.

In the meeting the parties stressed the importance of the Commission taking action, at this time, to confirm facilities-based VoIP providers' rights to direct IP-to-IP interconnection pursuant to section 251(c)(2) of the Communications Act, as amended. The parties discussed the importance of specific rights associated with section 251(c)(2) - such as direct interconnection - and the fact that the language of the statutory provision itself provides sufficient guidance to allow the negotiations for IP interconnection to begin.

We also expressed the competitive industry's need for a longer time period to transition from intrastate rates to interstate rates than is provided for in the ABC Plan.

Please do not hesitate to contact me if you have any questions regarding this submission.

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy

cc (via email): Christine Kurth